

KEMP JONES, LLP
3800 Howard Hughes Parkway
Seventeenth Floor
Las Vegas, Nevada 89169
(702) 385-6000 • Fax (702) 385-6001
kjc@kempjones.com

J. RANDALL JONES, ESQ. (#1927)
r.jones@kempjones.com
MICHAEL J. GAYAN, ESQ. (#11135)
m.gayan@kempjones.com
MONA KAVEH, ESQ. (#11825)
m.kaveh@kempjones.com
KEMP JONES, LLP
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
Telephone: (702) 385-6000
Facsimile: (702) 385-6001

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SARA SANGUINETTI, individually and on
behalf of all others similarly situated;

Plaintiffs,

vs.

NEVADA RESTAURANT SERVICES,
INC.,

Defendant.

RAYMOND D. SPEIGHT, individually and
on behalf of all others similarly situated;

Plaintiffs,

vs.

NEVADA RESTAURANT SERVICES,
INC.,

Defendant.

Case No.: 2:21-cv-01768-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF MOTION TO STAY CASE
PENDING DETERMINATION OF
SUBJECT MATTER JURISDICTION
[ECF NO. 71]**

[FIRST REQUEST]

Consolidated With: 2:21-cv-01780-RFB-EJY

Pursuant to Local Rules IA 6-1 and 7-1, Defendant Nevada Restaurant Services, Inc. (“Defendant”), and Plaintiffs Sara Sanguinetti, Raymond D. Speight, David Dietzel, Patricia Saavedra, and Nina S. Kuhlmann (“Plaintiffs”), by and through their counsel of record, hereby stipulate, agree, and respectfully request that the Court extend the deadline for Defendant to file

its Reply in Support of Motion to Stay Case Pending Determination of Subject Matter Jurisdiction [ECF No. 71] from July 12, 2023, to July 19, 2023.

1. On June 21, 2023, Defendant filed a Redacted and Filed Under Seal version of its Motion to Stay Case Pending Determination of Subject Matter Jurisdiction (“Motion to Stay”). ECF Nos. 71, 72 (FUS).

2. On July 5, 2023, Plaintiffs filed their Opposition to the Motion to Stay. ECF No. 79. Defendant’s Reply is currently due on July 12, 2023.

3. Defendant’s counsel respectfully requests a short one-week extension (July 19, 2023) to file Defendant’s Reply in Support of the Motion to Stay in light of their current schedule and the undersigned recently returning to this jurisdiction, other deadlines in this matter that the parties are working on (ECF No. 76), multiple depositions scheduled for the week of July 10 in a different matter, and because of another dispositive motion deadline of July 14, 2023, in a different United States District Court case. Plaintiffs do not object to Defendant’s request.

4. This request is not for purposes of delay. This is Defendant’s first request for an extension to file its Reply in Support of Motion to Stay.

Dated July 10, 2023.

Dated July 10, 2023.

KEMP JONES, LLP

/s/ Mona Kaveh
J. Randall Jones, Esq. (#1927)
Michael J. Gayan, Esq. (#11135)
Mona Kaveh, Esq. (#11825)
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169

*Attorneys for Defendant
Nevada Restaurant Services, Inc.*

/s/ George Haines
George Haines, Esq. (#9411)
Gerardo Avalos, Esq. (#15171)
FREEDOM LAW FIRM
8985 South Eastern Ave., Suite 350
Las Vegas, Nevada 89123

Gary M. Klinger*
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
227 Monroe Street, Suite 2100
Chicago, IL 60606

David Hilton Wise, Esq.
Joseph M. Langone, Esq.*
WISE LAW FIRM, PLC
421 Court Street
Reno, Nevada 89501

KEMP JONES, LLP
3800 Howard Hughes Parkway
Seventeenth Floor
Las Vegas, Nevada 89169
(702) 385-6000 • Fax (702) 385-6001
kjc@kempjones.com

M. Anderson Berry, Esq.*
Gregory Haroutunian, Esq.*
CLAYEO C. ARNOLD,
A PROFESSIONAL LAW CORP.
865 Howe Avenue
Sacramento, CA 95825


David K. Lietz*
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
5335 Wisconsin Avenue NW, Suite 440
Washington, D.C. 20015-2052

Michael Kind, Esq. (#13903)
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

Jean Sutton Martin, Esq.*
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602

Attorneys for Plaintiffs and the Class
**pro hac vice*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 12th day of July, 2023.